

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION

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No. 1:19-md-2875-RBK
Hon. Robert Kugler

**DECLARATION OF DREW T. DORNER REGARDING SUBPOENA FOR
VIDEOTAPED DEPOSITION OF ANTHEM HEALTH PLANS OF MAINE, INC.**

I, Drew T. Dorner, declare as follows:

1. I am counsel to defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S. Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S. LLC (“Defendants”) in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. By this Declaration, on behalf of Defendants, and by e-mails and telephone conferences communicated previously, I have given notice to all parties of the October 21, 2021 deposition of Anthem Health Plans of Maine, Inc. d/b/a Anthem Blue Cross and Blue Shield (“Anthem”).

3. On October 1, 2021, I served a Subpoena to Testify at a Deposition in a Civil Action (“Subpoena”) upon counsel for Anthem as well as upon plaintiffs’ executive committee and counsel for all defendants in this action. A copy of the Subpoena accompanies this Declaration.

4. The Subpoena set forth a start time for the deposition of 9:00 a.m. ET on October 21, 2021.

5. Subsequent to service of the Notice, counsel for Anthem, plaintiffs, and defendants agreed to change the start time to 10:00 a.m. ET.

6. In lieu of serving a second subpoena, counsel for Defendants is providing this declaration to inform the Court and all parties to this action of the modified start time. Defendants' counsel further states that to the best of his knowledge, any attorneys involved in this matter who had expressed their intention to attend MADA's deposition were informed of the earlier start time several days before the filing of the Subpoena and this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2021 at Washington, District of Columbia.

/s/ Drew T. Dorner
Drew T. Dorner